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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

11 IN RE META PIXEL TAX FILING
12 CASES

13 This document relates to:

14 All actions
15
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Master Case No. 5:22-cv-07557-PCP

Assigned to the Honorable P. Casey Pitts

**[PROPOSED] ORDER GRANTING MOTION
TO INTERVENE**

1 Movants Julio Armstrong, Chesley Barnes, Samantha Brewster, Patricia Carlson, Cessley Cole,
 2 Leslie Dent, Lonnie Dunaway, Joanna Gasperson, Flor Gomez, Beth Howard, Jason Karras, Justin Leo,
 3 Joseph Lipuma, Alysha Ottrix, Krystal Smith, Denise Sturgeon, Angela Wardell, Rosa Wardlow, Rachel
 4 Wegleitner and Kristen Wilder (collectively “Movants”) filed a Motion to Intervene requesting an order
 5 allowing them to intervene in this case and modify the protective order. Good cause appearing, it is
 6 HEREBY,

7 **ORDERED**, that Movants are permitted to intervene in this case pursuant under Fed. R. Civ. P.
 8 24(b);

9 **IT IS FURTHER ORDERED**, that the protective order in this case is modified to allow
 10 Movants’ access to the following materials currently filed under seal or marked confidential:

- 11 1. sealed/redacted materials filed in relation to the motion for class certification (Dkt. No.
 12 218), including expert witness reports, which describe or relate to Movants’ dealings with
 13 H&R Block as persons who used H&R Block’s online tax preparation service at relevant
 14 times;
- 15 2. documents, discovery responses and testimony (deposition transcripts, declarations,
 16 affidavits) filed or exchanged in discovery, which relate to H&R Block’s use of Meta’s
 17 or other third-party’s tracking pixels in relation to Movants’ dealings with H&R Block;
- 18 3. documents that relate to H&R Block’s use of any third-parties, such as advertising
 19 agencies, in relation to its’ use of pixel technology, including but not limited to Gale
 20 Agency / Gale Partners and Razorfish. *See, e.g.*, Ex. 3 to Second Notice of Subpoenas to
 21 TaxSlayer, LLC, TaxAct, Inc., and H&R Block, Inc. and HRB Digital LLC, Dkt. No.
 22 154-3;
- 23 4. any reports provided to H&R Block by Meta in relation to H&R Block’s use of Meta’s
 24 tracking pixels.

25 **IT IS SO ORDERED.**

26 DATED: _____

 27 Hon. P. Casey Pitts
 UNITED STATES DISTRICT JUDGE